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DELTA COUNCIL
MAILROOM

2011 SEP 27 PM 1:32

September 19, 2011

Mr. Joe Grindstaff
Executive Officer
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA 95814

RE: Levee Protection Prioritization Needs

Dear Mr. Grindstaff:

As you know, the Contra Costa Council has been following development of the Delta Plan. We have previously appeared before the Council and submitted written comments. We appreciate your attention to our comments and are very appreciative of the changes incorporated into the Fifth Draft. Our comments have been directed towards the chapter to Reduce Risks to People, Property and State Interests (i. e. Levee chapter). We are satisfied with the direction by the Council regarding the risk management approach. However, we now request that you take one more step by including a recommendation for development of a specific prioritization plan for levee improvements that would be needed to protect public interests.

The fifth draft of the Delta Plan includes an expanded discussion about the importance of levee infrastructure to Reduce Risk to People, Property and State Interests (Chapter 7). The draft presents a 5-stage levee classification matrix based on protected land-use, with corresponding levee minimum design criteria (Table 7-1). The minimum classification provides for no required flood protection for lands that can sustain potential flooding. The highest classification requires robust levee designs for a 200-year flood event to protect urban areas. The logic contained within the 5-stage classification system is understandable and supportable.

The draft also includes a discussion about flood risk potential and analytical concepts. Risks can and should be quantified to be able to prioritize probable improvements. The draft includes a general statement that the Expected Annual Damage risk assessment method be utilized to prioritize levee investment decisions. But, the draft does not extend the general statement into a specific recommendation as to how an Expected Annual Damage methodology would be developed and incorporated for future levee improvements.





The Council has identified 65 islands and land tracts being protected by levees. Each of those islands and tracts include individual land uses and facilities requiring flood protection. The Delta Plan should include an additional set of recommendations that would establish that a responsible state agency undertake the risk assessment methodology for each island and establish the resultant risk assessment based on what is actually being protected behind their respective levees. The assessment should include the levee condition and the classification based on criteria in Table 7-1. A specific prioritization schedule should be prepared subject to public review with a corresponding improvement needs ranking. A ranking system for all 65 islands will indeed be difficult and probably controversial, but how else will state and federal improvement investment funds be allocated? A multi-year improvement program should be the desired result and the Delta Plan should include the appropriate recommendations.

A prioritization schedule is essential to allocate whatever public funds are available. We are aware that the City of Stockton wastewater treatment plant is protected by the levees surrounding Boggs Tract. If for any reason a segment of that levee system should fail, the wastewater treatment plant would be under water and out-of-service. Untreated wastewater from the City of Stockton would continue to flow untreated into the San Joaquin River, causing widespread contamination until such time that the levee could be repaired, dewatered and that treatment facilities be repaired and placed back into service. This type of damage would be considered catastrophic for all intended uses of water flowing through the Delta. It is very conceivable that Delta operations would be curtailed until deemed safe to resume by appropriate governmental entities. This is the type of "critical" or "supercritical" levee systems that should be considered very high or highest priority. There are undoubtedly other tracts with similar critical facilities being protected by their respective levee systems. The Boggs Tract scenario is just one example of why a systematic plan needs to be developed. The existing draft does not include recommendations on how to make such assessments and then provide for subsequent priority decisions.

We request that the Stewardship Council modify the existing chapter to include a recommendation (or recommendations) to utilize risk management methods to determine a priority system of levee improvements followed by establishing a subsequent island-by-island specific improvement plan.

Sincerely yours,

Linda Best
President & CEO

